

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

FLORENCE WALLACE, ET AL.	:	<b>CONSOLIDATED TO:</b>
	:	
Plaintiffs,	:	<b>CIVIL ACTION NO. 3:09-cv-0286</b>
	:	
v.	:	
	:	(JUDGE CAPUTO)
ROBERT J. POWELL, ET AL.	:	
	:	
Defendants.	:	

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

WILLIAM CONWAY, ET AL.	:	
	:	
Plaintiffs,	:	CIVIL ACTION NO. 3:09-cv-0291
	:	
v.	:	
	:	(JUDGE CAPUTO)
MICHAEL T. CONAHAN, ET AL.	:	
	:	
Defendants.	:	

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

H.T., ET AL.	:	
	:	
Plaintiffs,	:	CIVIL ACTION NO. 3:09-cv-0357
	:	
v.	:	
	:	(JUDGE CAPUTO)
MARK A. CIAVARELLA, ET AL.	:	
	:	
Defendants.	:	

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

SAMANTHA HUMANIK,	:	
	:	
Plaintiffs,	:	CIVIL ACTION NO. 3:09-cv-0630
	:	
v.	:	
	:	(JUDGE CAPUTO)
MARK A. CIAVARELLA, JR.,	:	
ET AL.	:	
	:	
Defendants.	:	

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**PLAINTIFFS' MOTION PURSUANT TO LOCAL RULE 7.8(b)(3)  
TO EXCEED PAGE LIMIT FOR PLAINTIFFS' BRIEF  
IN SUPPORT OF THE MOTION FOR FINAL APPROVAL  
OF THE MASTER SETTLEMENT AGREEMENT**

The undersigned Plaintiffs file this motion seeking leave to file a Brief in Support of the Motion for Final Approval ("Brief in Support") in excess of the page limits permitted by Local Rule 7.8(b). In support thereof, Plaintiffs state as follows:

1. On November 27, 2013, this Honorable Court entering an order granting Preliminary Approval of the settlement with Defendants Pa Child Care, LLC, Western PA Child Care, LLC and Mid-Atlantic Youth Services, Inc. (hereinafter "Provider Defendants") (Docket No. 1491).
2. The November 27, 2013 Order scheduled the hearing on the Motion

for Final Approval for June 10, 2014, with briefs in support of the Motion to be filed 10 days prior to the hearing date.

3. Based on the instruction set forth in the November 27, 2013 Order, requiring that briefs in support of Motions for Final Approval be filed 10 days before the hearing date, all briefs in support of Motions for Final Approval are due on May 30, 2014.

4. Because of the extensive factual and legal analysis required to support the Motion for Final Approval, Plaintiffs cannot fully and adequately articulate their arguments in fifteen (15) pages or 5,000 words, the length allowed for briefs pursuant to Local Rule 7.8 of the United States District Court for the Middle District of Pennsylvania.

5. Plaintiffs will require no more than sixty (60) pages or 15,000 words for their Brief in Support.

6. Allowing a reasonable page and word exception to Rule 7.8 will result in substantial judicial economy, allowing the parties and the Court to more fully analyze the legal and factual issues involved.

7. The Provider Defendants do not oppose this Motion.

8. Accordingly, Plaintiffs respectfully seek the Court's authorization to file a Brief in Support of the Motion for Final Approval not to exceed sixty (60) pages or 15,000 words.

Dated: April 25, 2014

Respectfully submitted,

By: /s/ David Senoff

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*Case No. 09-cv-0286*

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By: /s/ Marsha Levick

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*Case No. 09-0630*

**CERTIFICATE OF CONCURRENCE OR NON-CONCURRENCE**

I, David S. Senoff, hereby certify, pursuant to Local Rule 7.1, the counsel for all represented parties was contacted for purposed of seeking concurrence in the foregoing motion.

Counsel for the Provider Defendants concur in the Motion. At the time of filing, no other parties had responded to Plaintiffs' request for concurrence in the instant Motion.

s/ David S. Senoff  
David S. Senoff

**CERTIFICATION OF SERVICE**

I, David S. Senoff, hereby certify that, on this 25<sup>th</sup> day of April, 2014, the foregoing Plaintiffs' Motion to Exceed Page Limitations for Brief in Support of Motion for Final Approval was filed and made available via CM/ECF to all counsel of record. Additionally, the foregoing was served by first-class mail upon the parties proceeding *pro se*:

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s/ David S. Senoff  
David S. Senoff



**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

FLORENCE WALLACE, ET AL.	:	<b>CONSOLIDATED TO:</b>
	:	
Plaintiffs,	:	<b>CIVIL ACTION NO. 3:09-cv-0286</b>
	:	
v.	:	
	:	(JUDGE CAPUTO)
ROBERT J. POWELL, ET AL.	:	
	:	
Defendants.	:	

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

WILLIAM CONWAY, ET AL.	:	
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**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

H.T., ET AL.	:	
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v.	:	
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**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

SAMANTHA HUMANIK,

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v.

MARK A. CIAVARELLA, JR.,  
ET AL.

Defendants.

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CIVIL ACTION NO. 3:09-cv-0630

(JUDGE CAPUTO)

**ORDER**

AND NOW, this      day of                      , 2014, upon consideration of Plaintiffs' Motion Exceed Page Limit for Plaintiffs' Brief in Support of the Motion for Final Approval of the Master Settlement Agreement, it is hereby ORDERED that Plaintiffs may file a Brief in Support of the Motion for Final Approval not to exceed sixty (60) pages or 15,000 words.

BY THE COURT:

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A. Richard Caputo, J.